Great Northern Paper, Inc.
Penobscot County
East Millinocket, Maine
A-405-70-A-I

Departmental
Findings of Fact and Order
Part 70 Air Emission License

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Great Northern Paper, Inc. (GNP)
LICENSE NUMBER	A-405-70-A-I
LICENSE TYPE	Initial Part 70 License
NAICS CODES	322122
NATURE OF BUSINESS	Paper Mill
FACILITY LOCATION	Main St., East Millinocket
DATE OF LICENSE ISSUANCE	October 13, 2002
LICENSE EXPIRATION DATE	October 13, 2007

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Power Boiler #1 (EB1)	370 MMBtu/hr	Fuel Burning, #6 fuel oil
Power Boiler #2 (EB2)	370 MMBtu/hr	Fuel Burning, #6 fuel oil
Power Boiler #3 (EB3)	498 MMBtu/hr (biomass) 240 MMBtu/hr (oil)	Fuel Burning, biomass & #6 fuel oil
Fire Protection Pump	4.69 MMBtu/hr	Fuel Burning, Diesel
Clarifier Emergency Back-up Pump, EWWTP-S3	225 hp (2.1 MM Btu/hr)	Fuel Burning, Diesel
Solvent Degreasers	N/A	Process Equipment
Woodyard (EWY)	310,000 cords/yr*	Process Equipment
Grinder Room (EGR)	310,000 cords/yr*	Process Equipment
Screen Room (ESR)	645,000 air dried tons pulp/yr*	Process Equipment
Recycle Facility (ERCY)	600 air dried tons pulp/day*	Process Equipment
Paper Mill (EPM)	593,125 ADTP/year*	Process Equipment
Wastewater Treatment Plant (EWWTP)	45 x 10^6 gal/day*	Process Equipment
Lime Silos	N/A	Process Equipment

Note: * - Unit capacities for process equipment are listed for informational purposes only and are not intended as license restrictions.

GNP has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of Chapter 140 of the Department's Regulations.

C. Application Classification

The application for GNP does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Power Boilers #1 & #2 (EB1 & EB2)

Boilers #1 and #2 were manufactured by Combustion Engineering with maximum design heat inputs of 370 MMBtu/hr each firing #6 fuel oil. The boilers were installed in 1953, prior to the New Source Performance Standards (NSPS) Subpart D, Da, and Db applicability dates. Low NO_x burners and a Foxboro IA Digital Control System were installed on Boilers #1 & #2 in 1994 – 1995. Both boilers are currently operated at an annual capacity factor of less than 30%. Per Chapter 117, boilers that are required by a federally enforceable license condition to remain at a capacity factor of less than 30% are not required to install Continuous Opacity Monitors (COMS) or NO_x Continuous Emission Monitors (CEMS). Emissions exit through separate 169-ft stacks.

Streamlining

Opacity

GNP accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(2) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Particulate Matter

GNP accepts streamlining for particulate matter requirements. Chapter 103, Section 2(A)(1) of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) particulate matter limit is more stringent. Therefore, only the more stringent BPT particulate matter limit is included in this license.

Sulfur Dioxide

GNP accepts streamlining for sulfur dioxide requirements. Chapter 106, Section 2(A)(2) of the Department's regulations and BPT requirements are applicable. The BPT limit is more stringent. Therefore, only the more stringent sulfur limit is included in this license.

Nitrogen Oxides

GNP accepts streamlining for nitrogen oxide requirements. Chapter 138, Section (4)(1) of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) limit is more stringent. Therefore, only the more stringent BPT nitrogen oxides limit is included in this license.

Periodic Monitoring

Periodic monitoring shall consist of maintaining the following records: fuel use records, supplier's fuel oil analyses or receipts showing % sulfur and Btu values, and documentation of the annual capacity factor.

Based on MEDEP Chapter 117 (1)(B)(1)(b), periodic monitoring by the source for opacity in the form of visible emission testing via COMs or EPA Method 9 is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

B. Power Boiler #3 (EB3)

Boiler #3 was manufactured by Foster-Wheeler with a maximum design heat input of 498 MMBtu/hr firing multiple fuels including boimass and #6 fuel oil. The maximum heat input from fuel oil is 240 MMBtu/hr. Biomass includes wood, bark, paper cores and other paper related waste products, primary clarifier sludge from the Millinocket and East Millinocket mills, recycle plant sludge, telephone poles, and railroad ties. The New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart D does not apply since Boiler #3 has a maximum heat input firing fossil fuel of less than 250 MMBtu/hr. The boiler is not subject to NSPS Subpart Da as it is not an "electrical utility steam generating unit" nor Subpart Db since it was installed in 1980, prior to the applicability date. Low NO_x guns were installed in 1997. Particulate matter emissions are controlled by mechanical dust collectors and an electrostatic precipitator (ESP). Boiler #3 has a COM system and a NO_x CEM system. Emissions exit through a 269-ft stack.

Streamlining

Opacity

GNP accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(2) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Particulate Matter

GNP accepts streamlining for particulate matter requirements. Chapter 103, Section 2(A)(3)(b) of the Department's regulations and BPT requirements are applicable. There are also additional particulate matter limits set forth in a previously issued federally enforceable permit. The Best Practical Treatment (BPT) particulate matter limits are more stringent. Therefore, only the more stringent BPT particulate matter limits are included in this license.

Sulfur Dioxide

GNP accepts streamlining for sulfur dioxide requirements. Chapter 106, Section 2(A)(2) of the Department's regulations and BPT requirements are applicable. The BPT limit is more stringent. Therefore, only the more stringent sulfur limit is included in this license.

Nitrogen Oxides

GNP accepts streamlining for nitrogen oxide requirements. Chapter 138, Section (4)(3) of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) limit is more stringent. Therefore, only the more stringent BPT nitrogen oxides limit is included in this license.

Periodic Monitoring

Periodic monitoring shall consist of maintaining the following records: fuel use records, supplier's fuel oil analyses showing % sulfur and Btu values, and continuous monitoring of NO_x and opacity that meets the requirements of Chapter 117.

C. Fire Protection Pump

The Fire Protection Pump was installed in 1998, and has a design capacity of 4.69 MMBtu/hr.

In order to be exempt from NO_x RACT requirements, GNP accepted a license restriction of 500 hr/yr for the Fire Protection Pump to maintain NO_x emissions below 10 tons per year.

Streamlining

Opacity

GNP accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Sulfur Dioxide

GNP accepts streamlining for sulfur dioxide requirements. Chapter 106 and BPT limits are applicable. The BPT sulfur dioxide limit is more stringent. Therefore, only BPT requirements are included in this license.

Periodic Monitoring

Periodic monitoring shall consist of recordkeeping which includes hours of operation and fuel delivery receipts showing % sulfur.

Based on best management practices and the type of fuel for which the pump was designed, it is unlikely that the Fire Protection Pump will exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

D. Clarifier Emergency Back-up Pump

The Fire Protection Pump was installed in 1974, and has a design capacity of 225 hp (2.1 MMBtu/hr). Per MEDEP Chapter 140, Appendix B, Section B.3, any stationary internal combustion engine with a maximum design heat input of less than 3.0 MMBtu/hr firing fuel with a sulfur content less than 0.05% is considered insignificant and is not required to be included in the Part 70 license. Therefore, the Clarifier Emergency Back-up Pump is listed here for inventory purposes. GNP shall continue to maintain records to demonstrate that this unit does not fire fuel with a sulfur content greater than 0.05%. The Clarifier Emergency Back-up Pump is still subject to the requirements of MEDEP Chapter 101, Visible Emissions.

E. Woodyard

The woodyard includes all equipment from receiving logs through the sorting and storage. EPA reviewed the types and quantities of emissions emitted from woodyard operations while developing the pulp and paper MACT standards (40 CFR Part 63, Subpart S). It was determined that woodyards do not emit significant quantities of HAPS, and there are no reasonable control technologies

for controlling HAPs from woodyards. Therefore, this equipment is not required to be reviewed for Maximum Achievable Control Technology (MACT) under section 112(g). There are no additional controls required at this time for the woodyard.

F. Grinder Room

The grinder room is part of the groundwood mill, and includes all equipment from the live bin through the bull screen chest. The grinder room does not use chlorine or chlorine dioxide to brighten pulp, and there are no applicable requirements under 40 CFR Part 63, Subpart S, the pulp and paper industry MACT Standards, for the grinder room.

EPA reviewed the types and quantities of emissions emitted from mechanical pulping systems (groundwood mills) while developing the MACT standards. It was determined that mechanical pulping systems do not emit significant quantities of HAPS, and there are no reasonable control technologies for controlling HAPs from mechanical pulping systems. Therefore, this equipment is not required to be reviewed for Maximum Achievable Control Technology (MACT) under section 112(g). There are no additional controls required at this time for the grinder room.

G. Screen Room

The screen room is part of the groundwood mill, and includes all equipment from the cowan screens through the groundwood storage chest. The screen room does not use chlorine or chlorine dioxide to brighten pulp, and there are no applicable requirements under 40 CFR Part 63, Subpart S, the pulp and paper industry MACT Standards, for the screen room.

EPA reviewed the types and quantities of emissions emitted from mechanical pulping systems (groundwood mills) while developing the MACT standards. It was determined that mechanical pulping systems do not emit significant quantities of HAPS, and there are no reasonable control technologies for controlling HAPs from mechanical pulping systems. Therefore, this equipment is not required to be reviewed for Maximum Achievable Control Technology (MACT) under section 112(g). There are no additional controls required at this time for the screen room.

H. Recycle Facility

The recycle facility is a secondary fiber pulping system, and includes all equipment from wastepaper receiving through the low density storage chest. The recycle facility does not use chlorine or chlorine dioxide to brighten pulp, and

there are no applicable requirements under 40 CFR Part 63, Subpart S, the pulp and paper industry MACT Standards, for the recycle facility.

EPA reviewed the types and quantities of emissions emitted from secondary fiber pulping systems (recycle mills) while developing the MACT standards. It was determined that secondary fiber pulping systems do not emit significant quantities of HAPS, and there are no reasonable control technologies for controlling HAPs from secondary fiber pulping systems. Therefore, this equipment is not required to be reviewed for Maximum Achievable Control Technology (MACT) under section 112(g). There are no additional controls required at this time for the recycle facility.

I. Paper Mill

The paper mill includes the paper machines (all equipment from the machine chests through the roll wrappers) and double wire presses (all equipment from the headboxes through the cutters). EPA reviewed the types and quantities of emissions emitted from paper making systems while developing the pulp and paper MACT standards (40 CFR Part 63, Subpart S). It was determined that no reasonable control technologies exist for removing HAPs from pulp arriving from pulping and bleaching systems. EPA also determined that the use of paper making systems additives and solvents do not result in significant emissions of HAPS. Therefore, this equipment is not required to be reviewed for Maximum Achievable Control Technology (MACT) under section 112(g). There are no additional controls required at this time for the paper mill.

J. Wastewater Treatment Plant

GNP operates a Wastewater Treatment Plant (EWWTP) to process effluent associated with the papermaking process.

Next to EWWTP there is a baghouse located on top of the lime silo. All displaced air during loading of the silo is directed through the baghouse.

Periodic Monitoring
Per VOC RACT requirements, GNP shall maintain a valid NPDES and/or SPDES permit for its Wastewater Treatment Plant.

K. Solvent Degreasers

GNP operates various cold cleaning degreasers.

Periodic Monitoring
Periodic monitoring for the degreaser units shall consist of recordkeeping on an annual basis including purchase receipts for solvent used in the degreasers.

L. Lime Silos

GNP operates various lime silos with associated baghouses. In order to minimize fugitive emissions, GNP shall maintain all baghouses to achieve visible emissions no greater than 10% opacity on a six-minute average basis.

M. VOC RACT

The following processes emit VOCs:

1. Pulp Processes
   The pulp processes include the woodroom, the grinder room, the stock chests, screening and washing, and the recycle facility. These processes are subject to VOC RACT. The woodyard is exempt per Chapter 134 of the Department's regulations.

2. Paper Processes
   The paper processes include the paper machines, double wire presses, and the finishing area. The paper machine area emissions (paper machines, double wire presses, finishing, and converting) are exempt from the VOC RACT per Chapter 134 of the Department's regulations.

3. Wastewater Treatment System
   The wastewater treatment system is subject to VOC RACT.

4. Combustion Sources
   The combustion sources include the two oil fired boilers, the biomass boiler, the fire protection pump, and the clarifier emergency back-up pump. These emissions are associated with products of incomplete combustion and are exempt from VOC RACT per Chapter 134 of the Department's regulations.

N. NO_x RACT

The following emission units are subject to NO_x RACT:

Emission Unit	Maximum Capacity (MMBtu/hr)	Fuel Type
Power Boiler #1	370	#6 oil
Power Boiler #2	370	#6 oil
Power Boiler #3	498	biomass and #6 oil

In order to meet NO_x RACT requirements, Boilers #1 & #2 have been retrofitted with low NO_x burners. Per Chapter 117 of the Department's regulations, a NO_x CEM will not be required on Boiler #1 or #2 unless the 30% annual capacity is exceeded. In order to document compliance, monthly fuel records shall be kept and GNP shall not exceed 6,483,276 gallons per year of fuel on a calendar basis for each boiler.

Boiler #3 will meet the NO_x RACT requirements by meeting the 0.40 lb/MMBtu standard for multi-fuel boilers, based on a 24-hour block average. Periods of startup, shutdown, and malfunctions are not included in determining the 24-hour block average per Chapter 138 (3)(O). Compliance will be demonstrated with the use of a CEM that satisfies the requirements of Chapter 117 of the Department's regulations.

GNP has additional equipment including, but not limited to, the clarifier emergency back-up pump and the fire protection pump which are exempt from NO_x RACT per Chapter 138 (1)(B)(1) and (2)(H).

O. Facility Emissions

Total Allowable Annual Emissions for the Facility*
(used to calculate the license fee)

Pollutant	Tons/Year
PM	444.6
PM_{10}	444.6
SO_2	3973.6
NO_X	1708.9
CO	613.0
VOC	102.9

*Based on:

- Power Boiler #3 firing 13,578,000 gal/year of #6 fuel oil with a sulfur content of 1.5%. Compared to the firing of biomass year-round, this scenario for Boilers #3 has a greater amount of total licensed emissions. This was the agreed upon method for calculating the fee per GNP's letter dated January 7, 1992.
- Power Boilers #1 & 2 firing together #6 fuel oil with a sulfur content of 0.7%. As for Boiler #3, this scenario has the larger amount of total licensed emissions as opposed to the firing of 1.5% sulfur oil in one boiler year-round and is therefore used for calculating the emission fee.
- The Fire Pump operating for 500 hours/year.
- PM_{10} and CO are not used in calculating the annual fee but are included for completeness.
- VOC emissions do not include process emission units (woodyard, grinder room, screen room, recycle facility, paper mill, wastewater treatment plant), which have no licensed emissions limits.

III. AIR QUALITY ANALYSIS

A. Overview

A refined modeling analysis was performed to show that emissions from Great Northern Paper (East Millinocket), in conjunction with other sources, will not cause or contribute to violations of Maine Ambient Air Quality Standards (MAAQS) for SO_2, PM_{10}, NO_2 or CO or to Class I or Class II increments for SO_2, PM_{10} or NO_2.

Since it has been determined by MEDEP-BAQ that GNP consumes PM_{10} and NO_2 increment, a Class II increment analysis was performed for these pollutants.

Due to large reductions in SO_2 emissions from the baseline year, no Class II increment analysis for SO_2 was required.

Because GNP is not undergoing a major modification, MEDEP-BAQ has determined that an evaluation of Class I increment, visibility and deposition is not required.

B. Model Inputs

ISCST3 modeling (in combined simple/complex terrain mode), using sequential meteorological data and a network of receptor grids, was used to address standards and increments in all areas.

The modeling was performed in accordance with the applicable requirements of the Maine Department of Environmental Protection, Bureau of Air Quality (MEDEP-BAQ) and the United States Environmental Protection Agency (USEPA).

A valid 5-year hourly on-site meteorological database was used in the refined modeling. Wind data was collected at a height of 90.00 meters at the GNP meteorological monitoring site during the 4-year period January, 1990 through December, 1993 with the fifth year comprised of data collected from July 1994 through June, 1995. Each year of meteorological data met the 90% data recovery requirement, both singularly and jointly. Missing data were interpolated or coded as missing, per EPA guidance. Sigma-theta data (calculated using four 15-minute averages), and wind data measured at the 10-meter level, were used to determine stability. Hourly mixing heights were derived from Caribou NWS surface and upper air data.

Point-source parameters, used in the MAAQS and increment modeling, are listed in Table IV-1. The modeling analyses accounted for the potential of building wake effects on emissions from all modeled stacks that are below their respective formula GEP stack heights.

TABLE IV-1 : Point Source Stack Parameters

Facility/Stack	Stack Base Elevation (m)	Stack Height (m)	GEP Stack Height (m)	Stack Diameter (m)	UTM Easting (km)	UTM Northing (km)
CURRENT						
Great Northern Paper (East Millinocket)						
Biomass Boiler	96.01	81.99	76.60	2.59	533.089	5052.085
Oil Boiler #1	94.48	51.51	76.60	2.74	533.097	5052.035
Oil Boiler #2	94.48	51.51	76.60	2.74	533.105	5052.050
Great Northern Paper (Millinocket)						
Power Boilers 1-4	128.60	106.00	106.00	5.49	522.957	5054.384
MgO Boiler	128.60	103.00	103.00	2.44	522.965	5054.325
Sulfite Mill – Process	108.20	75.30	86.12	0.61	522.976	5054.556
Sulfite Mill – Scrubber	128.60	65.00	65.00	0.76	522.967	5054.327
Off-Machine Coater	108.20	21.00	57.93	0.76	523.141	5054.476
PCC Carbonator #1	132.60	36.60	38.10	0.61	522.701	5054.517
PCC Carbonator #2	132.60	36.60	38.10	0.61	522.697	5054.522
PCC Carbonator #3	132.60	36.60	38.10	0.61	522.693	5054.526
PCC Lime Silo	132.60	19.90	38.10	0.63	522.680	5054.543

The emission parameters for GNP for MAAQS and increment modeling are listed in Table IV-2. Emission parameters for GNP are based on the maximum license allowed operating configuration. Fifteen load cases, including those that represented maximum, typical and minimum scenarios, were evaluated as part of the modeling. It was determined that maximum predicted impacts were generated by maximum load cases # 1 and # 3.

For the purposes of determining PM_{10} and NO_2 impacts, all PM and NO_x emissions were conservatively assumed to be PM_{10} and NO_2, respectively.

TABLE IV-2: Stack Emission Parameters

Facility/Stack	Averaging Periods	SO_2 (g/s)	PM_{10} (g/s)	NO_2 (g/s)	CO (g/s)	Stack Temp (K)	Stack Velocity (m/s)
CURRENT							
Great Northern Paper (East Millinocket)							
Maximum Case # 1							
Biomass Boiler (Firing Oil)	All	47.47	4.53	12.09	0.90	438.70	11.06
Oil Boiler #1	All	73.19	8.39	20.97	1.39	438.70	15.22
Maximum Case # 3							
Biomass Boiler (Firing Biomass)	All	1.50	9.41	25.09	14.79	439.80	34.36
Oil Boiler #1	All	34.03	4.19	20.97	1.39	438.70	15.22
Oil Boiler #2	All	34.03	4.19	20.97	1.39	438.70	15.22
Great Northern Paper (Millinocket)							
Maximum Load Case (w/ PCC Plant in Operation)							
Power Boilers 1-4	All	451.70	43.60	97.20	7.08	434.00	13.30
MgO Boiler (Acidification)	All	190.00	14.70	163.00	37.30	333.00	12.20
Sulfite Mill – Process	All	1.00	nm	nm	nm	333.00	3.80
Sulfite Mill – Scrubber	All	6.99	nm	nm	nm	322.00	17.00
Off-Machine Coater	All	.0005	0.01	0.47	0.12	422.00	17.70
PCC Carbonator #1	All	1.81	0.09	2.59	0.23	302.00	10.90
PCC Carbonator #2	All	1.81	0.09	2.59	0.23	302.00	10.90
PCC Carbonator #3	All	1.81	0.09	2.59	0.23	302.00	10.90
PCC Lime Silo	All	nm	0.14	nm	nm	293.00	30.50

Key: nm = not modeled

C. Applicant's Modeled Impacts

ISCST3 modeling (in combined simple/complex terrain mode), using five years of meteorological data, was performed for 2 maximum licensed allowed scenarios for GNP. The model results for GNP alone are shown in Table IV-3. All SO_2, PM_{10} and NO_2 averaging period impacts were above their respective Class II significance levels. Pollutant averaging periods where the maximum predicted impact exceeded the respective significance level are indicated in boldface type.

It was demonstrated that the applicant would have no significant impacts for all CO averaging periods in simple and complex terrain; thus no further analysis was required for these pollutant/terrain combinations.

TABLE IV-3 : Maximum ISCST3 (Simple/Complex Mode) Impacts from GNP (Alone)

Pollutant	Averaging Period	Max Impact ($\mu g/m^3$)	Receptor UTM E (km)	Receptor UTM N (km)	Receptor Elevation (m)	Load Case	Class II Significance Level ($\mu g/m^3$)
SO_2	3-hour	**564.62**	533.100	5051.300	140.21	Max #1	**25**
	24-hour	**181.29**	533.100	5051.300	140.21	Max #1	**5**
	Annual	**17.30**	533.300	5052.700	128.02	Max #1	**1**
PM_{10}	24-hour	**20.66**	533.100	5051.300	140.21	Max #3	**5**
	Annual	**1.93**	533.300	5052.700	128.02	Max #1	**1**
NO_2	Annual	**8.80**	533.300	5052.700	128.02	Max #3	**1**
CO	1-hour	42.32	530.750	5047.250	228.30	Max #3	**2,000**
	8-hour	19.47	530.250	5047.250	225.55	Max #3	**500**

Because modeled impacts from the applicant's facility were greater than significance levels for all SO_2, NO_2 and PM_{10} averaging periods, other sources not explicitly included in the modeling analysis must be included by using representative background concentrations for the area. Background concentrations used were based on conservative northern Maine rural background monitoring data for SO_2 and PM_{10} from data collected in the Dedham area (Bald Mountain Site) and for NO_2 from data collected in the Portland area (PEOPL Site). These background values are listed in Table IV-4.

TABLE IV-4 : Background Concentrations ($\mu g/m^3$)

Pollutant	Averaging Period	Background
SO_2	3-hour	52
	24-hour	29
	Annual	5
PM_{10}	24-hour	32
	Annual	10
NO_2	Annual	11

As the applicant's SO_2, PM_{10} and NO_2 impacts were significant, MEDEP examined other sources whose impacts would be significant in or near the applicant's significant impact area. Due to the GNP's location, extent of the significant impact area and nearby source's emissions, MEDEP has determined that Great Northern Paper (Millinocket) would also need to be included for combined source modeling.

Table IV-5 summarizes maximum combined source impacts. The predicted impacts are added to the conservative background concentrations to demonstrate compliance with MAAQS. All combined source impacts for all

pollutant/averaging periods were below their respective MAAQS. Because the impacts using this method meet MAAQS, no further MAAQS modeling for GNP needed to be performed.

TABLE IV-5 : ISCST3 (Simple/Complex Mode) Maximum Impacts

Pollutant	Averaging Period	Max Impact ($\mu g/m^3$)	Receptor UTM E (km)	Receptor UTM N (km)	Receptor Elevation (m)	Back-Ground ($\mu g/m^3$)	Max Total Impact ($\mu g/m^3$)	MAAQS ($\mu g/m^3$)
SO_2	3-hour	**818.57**	515.500	5058.500	260.60	**52**	**870.57**	**1150**
	24-hour	**186.80**	520.500	5046.500	249.94	**29**	**215.80**	**230**
	Annual	**21.64**	533.300	5052.700	128.02	**5**	**26.24**	**57**
PM_{10}	24-hour	**20.66**	533.100	5051.300	140.21	**32**	**52.66**	**150**
	Annual	**2.26**	533.300	5052.700	128.02	**10**	**12.26**	**40**
NO_2	Annual	**11.73**	533.300	5052.700	128.02	**11**	**22.73**	**100**

D. Class II Increment

Since it has been determined by MEDEP-BAQ that GNP consumes PM_{10} and NO_2 increment, a Class II increment analysis was performed for these pollutants. It is important to note that GNP conservatively assumed that no credit be taken for any sources existing in the 1987 NO_x or 1977 PM_{10} baseline years. In addition, no credit was taken for any off-site sources existing in either the 1987 or 1977 baseline years. In addition, PM_{10} and NO_2 predicted increment impacts are conservatively based upon the maximum license allowed emissions, not upon current actuals.

Results of the Class II increment analysis are shown in TABLE IV-6. All PM_{10} and NO_2 averaging period predicted increment impacts were below the respective increment standards.

Because the predicted impacts meet increment standards, no further Class II increment modeling needs to be performed.

TABLE IV-6 : Combined Source Class II Increment Consumption

Pollutant	Averaging Period	Max Impact ($\mu g/m^3$)	Receptor UTM E (km)	Receptor UTM N (km)	Receptor Elevation (m)	Class II Increment ($\mu g/m^3$)
PM_{10}	24-hour	20.66	533.100	5051.300	140.21	**30**
	Annual	2.26	533.300	5052.700	128.02	**17**
NO_2	Annual	11.73	533.300	5052.700	128.02	**25**

E. Class I Impacts

Because GNP is not undergoing a major modification, MEDEP-BAQ has determined that an evaluation of Class I increment, visibility and deposition is not required.

F. Summary

It has been demonstrated that emissions from GNP will not cause or contribute to violations of Maine Ambient Air Quality Standards (MAAQS) for SO_2, PM_{10}, NO_2 or CO or to Class II increments for PM_{10} or NO_2.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-405-70-A-I pursuant to MEDEP Chapter 140 and the pre-construction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All PSD permit conditions, federally enforceable, and State-only enforceable conditions in existing air licenses previously issued to Great Northern Paper, Inc. (East Millinocket) pursuant to the Department's pre-construction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

STANDARD STATEMENTS

(1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

(4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;

(5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

(a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

(b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or

the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October 2, 1997.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
A	Facility	MEDEP Chapter 104	Incinerator Particulate Emission Standard	No applicable sources at this facility.
B	Facility Fuel Oil Tanks	MEDEP Chapter 111	Petroleum Liquid Storage Vapor Control	Vapor pressure below applicability standards.
C	Facility	MEDEP Chapter 112	Bulk Terminal Petroleum Liquid Transfer Requirements	No applicable sources at this facility.
D	Facility	MEDEP Chapter 122	Chlorine and Chlorine Dioxide Emission Standard	No applicable sources at this facility.
E	Facility	MEDEP Chapter 124	Total Reduced Sulfur Control from Kraft Pulp Mills	No applicable sources at this facility.
F	Facility	MEDEP Chapter 129	Surface Coating Facilities	No applicable sources at this facility.
G	Facility	MEDEP Chapter 132	Graphic Arts-Rotogravure and Flexography	No applicable sources at this facility.
H	EB1, EB2, EB3, Fire Protection Pump	MEDEP Chapter 134	VOC RACT	VOCs from combustion units exempt per Section 1.C.4.
I	Woodyard	MEDEP Chapter 134	VOC RACT	VOCs from woodyards exempt per Section 1.C.6.
J	Paper Machines	MEDEP Chapter 134	VOC RACT	VOCs from paper machines exempt per Section 1.C.7.
K	EB1, EB2	40 CFR Part 60, Subpart D	Steam Generating Units	These boilers constructed prior to applicability date.
L	EB3	40 CFR Part 60, Subpart D	Steam Generating Units	Less than 250 MMBtu/hr firing oil.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
M	EB1, EB2, EB3	40 CFR Part 60, Subpart Da	Steam Generating Units	Not an electric utility.
N	EB1, EB2, EB3	40 CFR Part 60, Subpart Db	Steam Generating Units	Boilers constructed prior to applicability date.
O	EB1, EB2, EB3	40 CFR Part 60, Subpart Dc	Steam Generating Units	Boilers >100 MMBtu/hr and constructed prior to 1989.
P	Facility	40 CFR Part 60, Subparts C, Ca, Cb, E, Ea, Eb, O	Emission Guidelines and Compliance Times for Municipal Waste Combustors and Incinerators	No applicable sources at this facility.
Q	Facility	40 CFR Part 60, Subpart K, Ka, Kb	Storage Vessels for Petroleum Liquids	All tanks built prior to applicability date.
R	Facility	40 CFR Part 60, Subpart BB	Kraft Pulp Mills	No applicable sources at this facility.
S	Facility	40 CFR Part 60, Subpart QQ	Graphics Arts Industry: Publication Rotogravure Printing	No applicable sources at this facility.
T	Facility	40 CFR Part 60, Subpart RR	Pressure Sensitive Tape and label Surface Coating Operations	No applicable sources at this facility.

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

(a) Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

(b) Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

(c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

(d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;

(3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; **Enforceable by State-only**

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

(5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; **Enforceable by State-only**

(6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the

Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

(8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:

(i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;

(ii) to demonstrate compliance with the applicable emission standards; or

(iii) pursuant to any other requirement of this license to perform stack testing.

(b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

(c) submit a written report to the Department within thirty (30) days from date of test completion.

Enforceable by State-only

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

(a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance

with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

(c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

a. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

b. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

c. All other deviations shall be reported to the Department in the facility's semiannual report.

(11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.

(13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

(a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
(b) The compliance status;
(c) Whether compliance was continuous or intermittent;
(d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
(e) Such other facts as the Department may require to determine the compliance status of the source;

SPECIAL CONDITIONS

(14) **Boilers #1 & #2 (EB1 & EB2)**

A. GNP is licensed to operate EB1 and EB2 firing #6 fuel oil. [MEDEP Chapter 140, BPT]

B. The sulfur content of the fuel oil fired shall not exceed 1.5% by weight when firing only one of the boilers (EB1 or EB2) and 0.7% by weight when EB1 and EB2 are fired together, demonstrated by fuel supplier records or receipts for % sulfur and boiler use records. The Department recognizes that if EB3 suffers an emergency shutdown it may take up to 8 hours to drain the day tank and refill with 0.7% sulfur fuel. [MEDEP Chapter 140, BPT]

C. Emissions from EB1 and EB2 shall each not exceed the following limits when either boiler is fired alone:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.18	MEDEP Chapter 140, BPT	**Federally Enforceable**
NO_X	0.40	MEDEP Chapter 138, NOx RACT	**Federally Enforceable**

D. Emissions from EB1 and EB2 shall each not exceed the following limits when the boilers are fired together:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.09	MEDEP Chapter 140, BPT	**Federally Enforceable**
NO_X	0.40	MEDEP Chapter 138, NOx RACT	**Federally Enforceable**

E. The combined emissions from EB1 and EB2 shall not exceed the following limits:

Pollutant	lb/hr (total)	Origin and Authority	Enforceability
PM	66.6	MEDEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	66.6	MEDEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	580.9	MEDEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	296.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
CO	22.2	MEDEP Chapter 140, BPT	**Enforceable by State-only**
VOC	7.4	MEDEP Chapter 140, BPT	**Enforceable by State-only**

F. The 0.40 lb/MMBtu NO_x limit and lb/MMBtu particulate matter limits are demonstrated by stack testing in accordance with 40 CFR, Part 60, Appendix A upon request by the Department. [MEDEP Chapter 140, BPT]

G. Pound per hour limits are demonstrated by stack testing in accordance with 40 CFR, Part 60, Appendix A upon request by the Department. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

H. GNP shall maintain a log documenting the following information: date and time of any firing of either EB1 and/or EB2 and the sulfur content of the fuel oil fired. [MEDEP Chapter 140, BPT]

I. GNP shall continue to operate low NO_x burners on EB1 and EB2. [MEDEP Chapter 140, BPT]

J. GNP shall operate EB1 and EB2 such that the visible emissions from each stack does not exceed 40% opacity on a six-minute block average basis, except for no

more than two (2) six-minute block averages in a 3-hour block. Compliance shall be demonstrated by testing in accordance with 40 CFR, Part 60, Appendix A, Method 9 upon request by the Department. The start-up, shut-down, and malfunction conditions of MEDEP Chapter 101 also apply. [MEDEP Chapter 140, BPT]

K. GNP shall maintain records of annual #6 fuel use indicating the quantity of fuel consumed (gallons), the percent (%) sulfur content of the fuel by weight, and the heat content of the fuel, demonstrated by supplier's fuel oil analyses or receipts. [MEDEP Chapter 140, BPT]

L. GNP shall operate EB1 and EB2 such that each boiler does not exceed an annual capacity factor of 30% demonstrated by firing less than 6,482,400 gal/year of #6 fuel oil each. (Annual capacity factor means the ratio between the actual heat input to a steam generating unit from fuels during a calendar year, and the potential heat input to the steam generating unit had it been operating for 8760 hours at the maximum steady state design heat input capacity.) GNP shall maintain documentation of fuel use for EB1 and EB2 for each calendar year. Upon documentation that the annual fuel use has exceeded 6,482,400 gal/year for either Boiler #1 or Boiler #2, within 60 days thereafter GNP shall install, calibrate, maintain and operate a continuous monitoring system for opacity in accordance with the performance specifications set forth in 40 CFR Part 60, Appendix B for the boiler or boilers that exceed this limit. [MEDEP Chapter 117, Source Surveillance]

(15) **Boiler #3 (EB3)**

A. GNP is licensed to operate EB3 which is licensed to fire #6 fuel oil and biomass. Biomass includes wood, bark, paper cores and other paper related waste products, primary clarifier sludge from the Millinocket and East Millinocket mills, recycle plant sludge, railroad ties and telephone poles. [MEDEP Chapter 140, BPT]

B. GNP shall not exceed a heat input to EB3 of 240 MMBtu/hr from #6 fuel oil. [MEDEP Chapter 140, BPT]

C. The sulfur content of the fuel oil fired shall not exceed 1.5% by weight demonstrated by purchase records from the supplier or by other methods approved by the Department. [MEDEP Chapter 140, BPT]

D. Emissions from EB3 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.15	MEDEP Chapter 140, BPT	**Federally Enforceable**
NO_X	0.40	MEDEP Chapter 138, NO_x RACT	**Federally Enforceable**

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	74.7	MEDEP Chapter 140, BPT	**Federally Enforceable**
PM_{10}	74.7	MEDEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	376.8	MEDEP Chapter 140, BPT	**Federally Enforceable**
NO_X	199.2	MEDEP Chapter 140, BPT	**Federally Enforceable**
CO	117.5	MEDEP Chapter 140, BPT	**Enforceable by State-only**
VOC	16.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**

E. The 0.40 lb/MMBtu NO_x limit is based on a 24-hour daily block average, demonstrated by a CEM. In accordance with Chapter 138, periods of startup, shutdown, equipment malfunction and fuel switching shall not be included in determining 24-hour daily block arithmetic average emission rates provided that operating records are available to demonstrate that the facility was being operated to minimize emissions. A 24-hour block average basis shall be defined as midnight to midnight. GNP shall maintain the NO_x CEM in accordance with Chapter 117. The CEM shall meet the monitoring requirements of 40 CFR Part 60.13 as well as 40 CFR Part 60, Appendices B and F. [MEDEP Chapter 140, BPT]

F. NO_x lb/hr limits and SO_2, and PM limits shall be demonstrated by stack testing upon request by the Department in accordance with 40 CFR, Part 60, Appendix A. [MEDEP Chapter 140, BPT]

G. PM_{10}, VOC, and CO limits shall be demonstrated by stack testing upon request by the Department in accordance with 40 CFR, Part 60, Appendix A. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

H. GNP shall continue to operate and maintain mechanical dust collectors and an electrostatic precipitator (ESP) on Boiler #3 for the control of particulate matter. [MEDEP Chapter 140, BPT]

I. GNP shall operate Boiler #3 such that the visible emissions from the stack does not exceed 40% opacity on a six-minute block average basis, except for no more

than two (2) six-minute block averages in a 3-hour block. The start-up, shut-down, malfunction conditions of MEDEP Chapter 101 apply. [MEDEP Chapter 140, BPT]

J. GNP shall maintain a continuous opacity monitor (COM) on Boiler #3 in accordance with Chapter 117. The COM shall meet the monitoring requirements of 40 CFR Part 60.13 as well as 40 CFR Part 60, Appendices B and F. [MEDEP Chapter 140, BPT]

(16) **Fuel Limit for EB3**

GNP shall not exceed an annual #6 fuel cap for EB3 of 13,578,000 gal/year (12-month rolling total) demonstrated by fuel use records. [MEDEP Chapter 140, BPT]

(17) **Fire Protection Pump**

A. GNP is licensed to operate a Fire Protection Pump (4.69 MMBtu/hr) which is licensed to fire diesel fuel. [MEDEP Chapter 140, BPT]

B. The sulfur content of the diesel fuel fired shall not exceed 0.05% by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]

C. Emissions from the Fire Protection Pump shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	**Federally Enforceable**

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	0.56	MEDEP Chapter 140, BPT	**Federally Enforceable**
PM_{10}	0.56	MEDEP Chapter 140, BPT	**Federally Enforceable**
SO_2	0.23	MEDEP Chapter 140, BPT	**Federally Enforceable**
NO_X	20.42	MEDEP Chapter 140, BPT	**Federally Enforceable**
CO	4.40	MEDEP Chapter 140, BPT	**Federally Enforceable**
VOC	1.62	MEDEP Chapter 140, BPT	**Federally Enforceable**

D. GNP shall operate the Fire Protection Pump such that the visible emissions from the stack does not exceed 30% opacity on a six-minute block average basis, except for no more than two (2) six-minute block averages in a 3-hour block. [MEDEP Chapter 140, BPT]

E. GNP shall maintain records of annual diesel fuel use indicating the quantity of fuel consumed (gallons) and the percent (%) sulfur content of the fuel by weight demonstrated by purchase records from the supplier. [MEDEP Chapter 140, BPT]

F. GNP shall not exceed an annual usage of the Fire Protection Pump of 500 hr/year (12-month rolling total). The Fire Protection Pump shall be equipped with an hour meter and a written log shall be maintained of all the operating hours to demonstrate compliance with the 500 hr/year operational limit. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

(18) **Waste Water Treatment Plant (EWWTP)**

A. GNP shall maintain a valid NPDES and/or SPDES permit for its Wastewater Treatment Plant. [MEDEP Chapter 134, VOC RACT]

B. Opacity from the lime silo baghouse shall not exceed 20% opacity on a six-minute block average basis except for one (1) six-minute block average in a 1-hour period. [MEDEP Chapter 140, BPT]

(19) **Parts Washers**

The parts washers are subject to the operational and record keeping requirements of MEDEP Chapter 130 which include, but are not limited to, the following:

A. GNP shall keep records of the amount of solvent added to each parts washer.

B. GNP shall attach a permanent conspicuous label to each unit summarizing the following operational standards of Chapter 130:

1. Equip each cold cleaning degreaser with a cover that is easily operated with one hand if:
   a. the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 ^{o}F by ASTM D323-89; or,
   b. the solvent is agitated; or,
   c. the solvent is heated.
2. Close the covers on all solvent degreasing tanks when the tanks are not in use;
3. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
4. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);
5. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
6. Minimize drafts to less than 40 meters/minute;
7. Refrain from operating the cold cleaning degreaser upon the occurrence of

any visible solvent leak until such leak is repaired; and

8. Do not use any halogenated solvents in the degreasing tanks.

(20) **Recordkeeping Requirements**

A. Periodic Monitoring:

1. 12-month rolling sum fuel oil use in EB1, EB2, and EB3.
2. #6 fuel oil sulfur content.
3. Documentation of annual capacity factor for EB1 and EB2.
4. Log of the date, time, and sulfur content of fuel fired for all operation of EB1 and EB2.
5. Sulfur content of diesel fuel fired in the Fire Protection Pump and Clarifier Emergency Back-up Pump.
6. Fire Protection Pump and Clarifier Emergency Back-up Pump hours of operation.
7. Documentation that GNP is maintaining a valid NPDES and/or SPDES permit.
8. Solvent used in the degreasers.

B. For all CEMS and COMS recordkeeping shall include:

1. Documentation that all CEMS and COMS are continuously accurate, reliable and operated in accordance with Chapter 117, 40 CFR Part 51, Appendix P, and 40 CFR Part 60, Appendices B and F;
2. Records of all measurements, performance evaluations, calibration checks, and maintenance or adjustments for each CEMS and COMS as required by 40 CFR Part 51 Appendix P;
3. A report of other data indicative of compliance with the applicable emission standard for those periods when the CEMS or COMS were not in operation or produced invalid data. In the event the Department does not concur with the licensee's compliance determination, the licensee shall, upon the Departments request, provide additional data, and shall have the burden of demonstrating that the data is indicative of compliance with the applicable standard.

[MEDEP Chapter 117]

(21) **Quarterly Reporting**

The licensee shall submit a Quarterly Report to the Bureau of Air Quality within 30 days after the end of each calendar quarter, detailing the following for the control equipment, CEMS, and COMS required by this license. The initial quarterly report shall cover the period from the effective date of the license until the end of the reporting period.[MEDEP Chapter 117]

1. All control equipment downtimes and malfunctions;
2. All CEMS and COMS downtimes and malfunctions;
3. All excess events of emission and operational limitations set by this Order, Statute, state or federal regulations, as appropriate. The following information shall be reported for each excess event;
   a. Standard exceeded;
   b. Date, time, and duration of excess event;
   c. Maximum and average values of the excess event, reported in the units of the applicable standard, and copies of pertinent strip charts and printouts when requested;
   d. A description of what caused the excess event;
   e. The strategy employed to minimize the excess event; and
   f. The strategy employed to prevent reoccurrence.
5. A report certifying there were no excess emissions, if that is the case.

(22) **Semiannual Reporting**

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due with every other quarterly report, and the initial semiannual report is due January 30, 2003. The initial semiannual report shall cover the period from the effective date of this license until the end of the reporting period.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
   [MEDEP Chapter 140]

(23) **Annual Compliance Certification**

The licensee shall submit an annual compliance certification to the Department in accordance with Condition (13) of this license. The initial annual compliance certification is due January 30, 2003. The initial annual compliance certification shall cover the period from the effective date of the license until the end of the reporting period. [MEDEP Chapter 140]

(24) **Annual Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

1) A computer program and accompanying instructions supplied by the Department;

   or

2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted by September 1.

(25) **Miscellaneous**

The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. Section 3 §585-B, sub-§5	Reduce Mercury Use and Emissions	Enforceable by State-only

(26) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs. [40 CFR, Part 82, Subpart F]

(27) **Fee Due Date**

GNP shall pay the annual air emission license fee within 30 days of January 31st of each year. Pursuant to 38 M.R.S.A. Section 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 M.R.S.A. Section 341-D, Subsection 3.

(28) **Certification by a Responsible Official**
All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(29) The term of this license shall be five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2002.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:_____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/7/97
Date of application acceptance: 10/14/97

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.